

KMK | Keating Muething & Klekamp PLL
ATTORNEYS AT LAW

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March 20, 2007

VIA FACSIMILE AND REGULAR MAIL

Robert S. Kaiser, Esq.
7434 Jager Court
Cincinnati, Ohio 45230

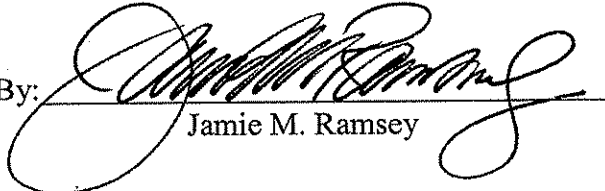
Re: William Engelman v. NITV Federal Services, LLC

Dear Mr. Kaiser:

Despite repeated requests, you still have not provided us with a date upon which your client is available for deposition. With the discovery deadline approaching fast, we have no choice but to issue the enclosed formal notice of your client's deposition for April 5, 2007. Should this date not be convenient for you or your client, we certainly will do our best to come up with an alternative date. We also would like to depose your client's wife, whom we assume you also are representing. Although we are aware that Mrs. Engelman is not a party to this lawsuit, it is our hope that we can arrange for her deposition (preferably on the same day as Mr. Engelman) without having to issue a subpoena. If this is not the case, then please notify Christy Nageleisen or me immediately so that we may arrange to have Mrs. Engelman served with a subpoena. Should we not hear from you, we will assume that: (1) Mr. Engelman will appear for deposition pursuant to his notice; and (2) Mrs. Engelman agrees to appear voluntarily for her deposition on April 5, 2007 beginning at 3:30 p.m. at our office.

Very truly yours,

KEATING MUETHING & KLEKAMP PLL

By: 
Jamie M. Ramsey

JMR:amt

Enclosure

SENT JOURNAL

DATE : MAR-21-2007 WED 02:57
 NAME : KMK
 TEL : 513 579 6457

NO.	FAX NAME/NUMBER	START TIME	TIME	MODE	PAGE	RESULTS
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463	99465252	03-21 02:48	00' 26"	ECM	2/2	OK

TOTAL TIME : 00:35' 38"

TOTAL PAGES : 149

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

WILLIAM ENGELMAN

Plaintiff,

-v-

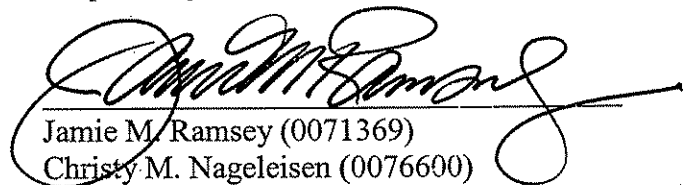
NITV FEDERAL SERVICES, LLC

Defendant.

) Case No. 1:06-cv-00223-MHW
)
) Judge: Michael Barrett
)
)
) NOTICE OF DEPOSITION
) OF WILLIAM ENGELMAN
)
)
)

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant NITV Federal Services, LLC, shall take the deposition of William Engelman. Said deposition shall be taken at the offices of Keating Muething & Klekamp, PLL, One East Fourth Street, Suite 1400, Cincinnati, Ohio 45202, commencing at 9:00 a.m. on Thursday, April 5, 2007, unless otherwise agreed by counsel. Said deposition shall be taken before a notary public or other officer authorized by law to administer oaths and shall continue from day-to-day until completion. The deposition will be recorded by stenographic means.

Respectfully submitted,



Jamie M. Ramsey (0071369)

Christy M. Nageleisen (0076600)

One East Fourth Street, Suite 1400

Cincinnati, Ohio 45202

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cnageleisen@kmklaw.com

Attorneys for Defendant/Counterclaim
Plaintiff NITV Federal Services, LLC

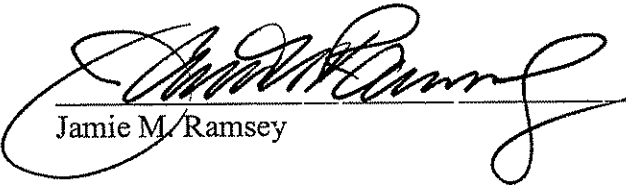
OF COUNSEL:

KEATING MUETHING & KLEKAMP PLL
One East Fourth Street, Suite 1400
Cincinnati, Ohio 45202
(513) 579-6400

CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2007, a copy of the foregoing was served upon the following by facsimile and regular mail.

Robert S. Kaiser
7434 Jager Court
Cincinnati, Ohio 45230


Jamie M. Ramsey